

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MILWAUKEE POLICE ASSOCIATION,
JACOB E. BACZEK,

Plaintiffs,

v.

Case No. 23-CV-123

CITY OF MILWAUKEE,

Defendant.

DEFENDANT'S INITIAL DISCLOSURE

The Defendant, City of Milwaukee, by City Attorney Tearman Spencer, represented by Assistant City Attorney James Lewis, pursuant to the Federal Rules of Civil Procedure, Rule 26 (a)(1), hereby provides the following initial disclosures.

- (1) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:
 - a. Sergeant David Grandsard, Milwaukee Police Department, 749 West State Street, Milwaukee, WI 53202. Sergeant Grandsard supervised Officer Baczek and will have information regarding Officer Baczek's use of comp time as well as the Milwaukee Police Department's rules and practices regarding use of comp time.
 - b. All witnesses disclosed in Plaintiff's Rule 26 initial Disclosure (ECF #9).
- (2) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

All responsive documents in the Defendant's possession are also equally available to the plaintiffs. Upon information and belief, the documents supporting the claims and defenses in this matter are possessed by both parties.

- (3) A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:
 - a. Monetary award of reasonable attorney fees, costs, and disbursements.
 - b. Award of such other relief as deemed necessary, just, equitable, and appropriate.
- (4) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Dated and signed at Milwaukee, Wisconsin this 5th day of April, 2023.

TEARMAN SPENCER
City Attorney

s/James D. Lewis
JAMES D. LEWIS
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State Bar No. 1056913
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